

PROJECT 25 - New Technology Standards

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January 16, 1998

Secretary
Federal Communications Commission
1919 'M' Street, N.W.
Washington, D.C. 20554

Dear Secretary:

Attached is the Project 25 Steering Committee's reply comments on WT-96-86.

On behalf of the Project 25 Steering Committee, I would like to thank you for the opportunity to participate in this important public safety spectrum allocation docket.

Sincerely,



Craig M. Jorgensen
Co-chair, Project 25

Attachment

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List A B C D E

Association of
Public Safety
Communications
Officials - Int'l

Telecommunications
Industry
Association

Department of Defense
National Communications System
Federal Law Enforcement
Wireless Users Group

National
Association of State
Telecommunications
Directors

Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

JAN 21 1998
FCC REC L 57001

In the Matter of)
)
The Development of Operational,) WT Docket No. 96-86
Technical and Spectrum Requirements)
For Meeting Federal, State and Local)
Public Safety Agency Communication)
Requirements Through the Year 2010)
)
Establishment of Rules and Requirements)
For Priority Access Service)

The Project 25 Steering Committee provides the following reply comments to those issues in Docket WT 96-86 which pertain to standardizing digital, land mobile radio equipment for use in this new spectrum which the Federal Communications Commission is allocating to public safety. As previously stated, the Project 25 Steering Committee is responsible for the final approval of Project

25 standards and technical papers which are submitted to the Telecommunications Industry Association (TIA) for consideration and approval as Project 25 TIA standards, Technical Systems Bulletins and Technical Recommendations.

The Project 25 Steering Committee is pleased to remind the Federal Communications Commission that the Project 25 process is user driven and responsive to the users' expressed needs. Of equal importance to the Commission is the fact that Project 25 standards are also carefully scrutinized and their merits debated in TIA's formal standards process before they are approved as TIA - Project 25 standards, Interim Standards, Technical Systems Bulletins or Technical Recommendations. TIA review and standards process is under the direct control and supervision of TIA management, staff and member volunteers. Since TIA has an "approved" standards process, we assume it generally operates in full compliance with the American National Standards Institute (ANSI) policy and guidelines for certified standards organizations. We believe the review process given to Project 25 standards meets and exceeds the criteria the Commission is seeking for user-driven and officially recognized standards.

The Project 25 Steering Committee encourages the Commission to consider that a significant number of the replies from the users

support the adoption of the Project 25 standards for baseline use in the proposed new allocation of new spectrum. We are pleased that this support includes the Association of Public Safety Officials International (APCO), which is the oldest and largest association representing all public safety services.

The Project 25 Steering Committee notes with interest that Motorola suggests that the Commission should rely on the users to develop standards. Project 25 standards meet and exceed Motorola's desire for "users to develop" the standards. We believe the Commission's failure to adopt Project 25 standards will perpetuate sole-source purchasing and force the public safety users to obtain digital equipment which is unique to a particular manufacturer. More importantly, if the Commission fails to take affirmative action on Project 25 standards, they will further erode the long-term potential for the public safety community to obtain true interoperability on an ubiquitous basis.

The Project 25 Steering Committee notes that Ericsson suggests that 12.5 kHz analog should be adopted as the baseline for interoperability. The Project 25 Steering Committee reiterates that their Phase I standard is based on 12.5 kHz channel width and mandates backward compatibility to analog. Thus, adoption of that interoperability standard would result in both an analog as well as a

digital standard. There appears to be no compelling reason to limit interoperability to analog modulation when it acts as a disincentive for conversion to digital technology because it fails to encourage full, robust interoperability. If the Commission does not encourage a transparent migration path to digital technology, they will prohibit the user from taking advantages of digital modulation, improved spectrum efficiencies, greater system security, and greater interoperability among public safety users.

Ericsson further recommends adoption of 6.25 kHz as the standard for all voice channels except those intended for interoperability. Project 25 believes this recommendation may be premature. Project 25 is currently working with TIA in the development of Phase II standards which are based on 6.25 kHz bandwidth, but completion is well into the future. To adopt a channel width requirement for which there is no standard and for which there appears to be no equipment yet available would not be in the best interest of the users. Rather, just as the Commission has done in the "refarming procedure," they should adopt a practical standard for which equipment is available and rely on the users and manufacturers to move to narrower channel widths when advisable. The inclusion of a mandated, artificial and arbitrary channel bandwidth before the equipment manufacturers are able to deliver a full product line of equipment would create an unnecessary and unwarranted obstacle to the public

safety agencies who have a critical need for new spectrum today. We would encourage the Commission to seek a more positive and productive way to expedite the migration to 6.25 KHz channels.

Although some commentators suggest that there is no need for trunked standards, APCO notes that there is a significant move toward the establishment of large trunked systems which serve multiple public safety disciplines. This will continue at an accelerated rate with the availability of this new spectrum. For the users, the most important digital standards are those that relate to trunked systems. Project 25, Phase I standards meet the users' needs because they incorporate both conventional and trunked systems. The Project 25 Steering Committee believes that since a digital standard is necessary to ensure interoperability there is no reason why this function should be confined to only channels which are designated for this specific purpose. There are many instances where extending the capability to interoperate on a digital trunked system would enhance public safety communications in both day-to-day and disaster-type incidents.

In conclusion, and after examination of the comments submitted, many of which are from users and agencies which have been deeply involved in the Project 25 process, we believe there are compelling reasons the Commission should adopt Project 25, Phase I as the

digital standard for the spectrum discussed in this proceeding.

Respectfully submitted,

Project 25 Steering Committee

by: *Craig M. Jorgensen*

Craig Jorgensen, Co-Chair

Art McDole

Art McDole, Co-Chair

Dated: *1/16/98*

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